

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHUN-KO CHANG, YI RAN WANG, GUANEE XIE, and JOHN DOE, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

SHEN YUN PERFORMING ARTS, INC., FEI TIAN COLLEGE, FEI TIAN ACADEMY OF THE ARTS, DRAGON SPRINGS BUDDHIST INC., INTERNATIONAL BANK OF CHICAGO, SHUJIA GONG a/k/a TIANLIANG ZHANG, HONGZHI LI, and RUI LI a/k/a SANDY REBECCA LEE,

Defendants.

Case No. 24-8980

Judge Philip M. Halpern

MOTION TO APPEAR *PRO HAC VICE*

Pursuant to Rule 1.3(c) of the Local Rules for the United States District Courts for the Southern and Eastern Districts of New York, I, Times Wang, hereby move this Court for an Order for admission *pro hac vice* to appear as counsel in the above-captioned case on behalf of Plaintiff Chun-Ko Chang.

I am a member in good standing of the bars of the State of California, the State of Colorado, and the District of Columbia. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

I have attached an affidavit as **Exhibit A** pursuant to Local Rule 1.3. Certificates of good standing from California, Colorado, and the District of Columbia are attached as **Exhibit B**. A proposed Order is attached as **Exhibit C**.

Dated: June 9, 2025

Respectfully submitted,

/s / Times Wang
FARRA & WANG PLLC
1543 Champa Street, Suite 400
Denver, CO 80202
Tel. 202-505-6227
twang@farrawang.com

*Attorney for Plaintiffs Chun-Ko Chang, Yi Ran
Wang, Guanee Xie, and John Doe*